

Planning Statement

Hemel465, Dacorum Borough Council

March 2024

Turley

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Peter Lawson
Peter.Lawson@turley.co.uk

Christopher Schiele
Christopher.Schiele@turley.co.uk

Jordan Bishop
Jordan.Bishop@turley.co.uk

Client
J Murphy and Sons

Our reference
JMUR3000

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1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of J Murphy & Sons (“Murphy”; “the Applicant”), in support of a full planning application for the proposed consolidation of existing car parking provision in a new Multi-Storey Car Park (“MSCP”) at Hemel465, Boundary Way, Hemel Hempstead, Herts, HP2 7LF (“the site”). The site falls within the jurisdiction of Dacorum Borough Council (“Dacorum BC”), who are the Local Planning Authority (“LPA”).
- 1.2 The site is located in the Maylands Business Park, a designated General Employment Area, and predominantly relates to the car park of an existing warehouse which benefits from and operates within a lawful B8 land use and provides approx. 43,200 sqm of employment-generating floorspace (including ancillary office accommodation).
- 1.3 In preparation for occupation by a new tenant, Sysco, the site is subject to a number of refurbishment and alteration works to ensure the existing warehouse is fit-for-purpose in order to provide modern storage and distribution floorspace which continues to serve the local and regional economy. For the avoidance of doubt, the Applicant already obtained two Certificates for Lawful Proposed Development in February 2024 (LPA refs. [24/00395/LDP] & [24/00396/LDP]).
- 1.4 In order to optimise the use and efficiency of the site, it is further proposed to consolidate the existing car parking provision on site, currently accommodated in the main car park to the south of the warehouse, as well as additional car parking areas along its northern and eastern boundary, in a single location through to provision of a new MSCP.
- 1.5 In preparation for occupation by Sysco, it is therefore proposed that a new MSCP is erected in the western parts of the existing main car park, thereby consolidating all car parking in a single location and freeing up other areas of the site for operational purposes once in use by the new occupier (i.e. additional service yard space/delivery vehicle parking).
- 1.6 In addition, minor external alterations to the existing ancillary office building are proposed as set out in the submitted plans/drawings.
- 1.7 The description of development is therefore as follows:

“Full Planning Application for the construction of a new multi-storey car park (and linked consolidation of the existing car parking provision across the site), and any associated access, infrastructure and hard and soft landscaping works (as well as minor external alterations to the ancillary office building).”
- 1.8 The scheme has been discussed prior to submission with Councillors and Officers at Dacorum BC on site where in principle support for the scheme was offered given the significant socio-economic benefits provided by the operation of the wider site.

1.9 Therefore it is considered that the principle of development (namely to provide improved and consolidated parking facilities on site) are in full accordance with the Development Plan.

Content of Application

1.10 This Statement should be read in conjunction with the supporting drawings and documents outlined below:

- Planning Application form (including Ownership Certificates) prepared by Turley;
- Planning Statement, prepared by Turley;
- Covering Letter, prepared by Turley;
- CIL Form, prepared by Turley;
- Site Location Plan, prepared by GTH;
- A suite of existing and proposed plans & drawings for approval, prepared by GTH;
- Design and Access Statement (including landscaping, lighting and fire details), prepared by GTH;
- Flood Risk Assessment, prepared by Engineeria;
- Sustainable Urban Drainage Strategy, prepared by Engineeria;
- Transport Statement (including Travel Plan), prepared by TPP;
- Biodiversity Net Gain Assessment, prepared by Arbtech.

1.11 This Planning Statement should be read alongside all documents submitted.

1.12 This Planning Statement is intended to assist the LPA in its determination of this planning application having regard to the requirements of the Development Plan, the National Planning Policy Framework (the “NPPF”), Planning Practice Guidance (the “PPG”) and any other relevant material considerations. It evaluates the Proposed Development against local and national planning policies and carries out an overall assessment of the planning balance.

1.13 The remainder of this Planning Statement is structured as follows:

- **Section 2: Site, and Planning History** – A review of the site, context and surroundings, including reference to any site-specific designations and its planning history;
- **Section 3: The Proposed Development** – A summary of the Proposed Development;

- **Section 4: Pre-application Summary** – A summary of the Applicant’s engagement at pre-application stage;
- **Section 5 – Planning Policy Context** – A review of relevant Planning Policies contained within the National Planning Policy Framework and the Local Development Plan to the consideration of this proposal;
- **Section 6: Planning Assessment** – Provides detail regarding the proposal’s compliance with the adopted Development Plan and other material considerations;
- **Section 7: Summary and Conclusions** – Provides a summary of the assessment and planning benefit in the context of the overall planning balance and judgement.

2. Site, Surroundings, and Background

The site

- 2.1 The site is located in the Maylands Business Park, a designated General Employment Area, and relates to the car park/ancillary office building of an existing warehouse which benefits from and operates within a lawful B8 land use and provides approx. 43,200 sqm of employment-generating floorspace (including ancillary office accommodation).
- 2.2 The site is bounded by Boundary Way to the south, Buncefield Lane to the west/north, and parts of the Buncefield Petrol Storage/Oil Depot Terminal (elaborated further below) as well as two wider warehouses (DBD Group & Majestic Wine) to the east.
- 2.3 The site is located on the south-east edge of the industrial estate. The nearest major motorway is the M1 located a short distance to the east, however access is achieved through first reaching the A414 located to the south of the site.
- 2.4 The site is neither statutorily nor locally listed, and not within or in close proximity to a Conservation Area.
- 2.5 Other than the ancillary office building, the site comprises of hardstanding (with limited soft landscaping features) and is currently used as car park for the on-site operation. The Applicant is the freeholder of the wider site, which includes the warehouse itself and the servicing yard that surrounds it, however the proposals subject to this development only concern the area within the highlighted area in **Figure 2.1**.
- 2.6 Nevertheless, given the wider site is in the control of the Applicant, the Council can apply planning conditions to those areas, as set out in this Statement.



Figure 2.1: Existing Site, Application red line, and nearby proximities (Design and Access Statement, prepared by GTH Architects)

- 2.7 The site currently accommodates 555x (operational/employee) car parking spaces, comprising 292x car parking spaces in Parking Zone 1 to the south of the existing

warehouse, 208x car parking spaces in Parking Zone 2A to the east of the Buncefield terminal and north of the existing warehouse, and a further 55x car parking spaces in Parking Zone 2B to the north of the existing warehouse per **Figure 2.2** below. It is important to note that the existing parking provision along the northern/eastern site boundaries was inserted at a later date to address the parking requirements of the former tenant at peak times, as set out in the *Planning History Overview* below.

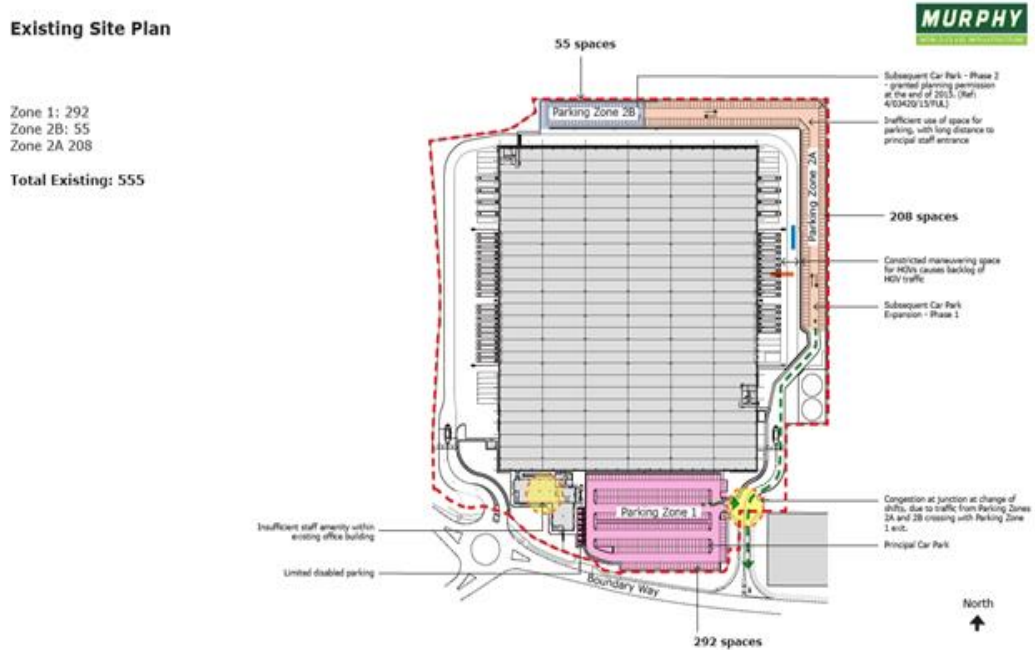


Figure 2.2: Existing Site and Parking Plan (prepared by GTH)

Site Surroundings

Buncefield Oil Depot Terminal / HSE Consultation Zones

- 2.8 In December 2005 a number of explosions occurred at Buncefield Oil Storage Depot, (now consolidated towards the eastern extent of the site as above), which caused significant damage to both commercial and residential properties within the vicinity.
- 2.9 In response, the Health and Safety Executive (“HSE”), in its role as statutory consultee, sought greater control over future developments around Large Scale Petrol Sites (“LSPSS”) similar to (and including) Buncefield. HSE have produced their own land use planning methodology, where developments are categorised into one of four sensitivity levels, which corresponds to a decision matrix which allows them to provide advice on any potential scheme.
- 2.10 A new planning consultation zone was added (Development Proximity Zone, ‘DPZ’), being the zone closest to the boundary within the inner zone. HSE advises that the DPZ will extend to 150m from the boundary of the relevant storage tank bunds within the Large Scale Petrol Storage Sites (‘LSPSS’). The Inner Zone and Middle Zone extend 250m and 300m, respectively, from the tank bund (with the Outer Zone being 400m from the tank bund), as set out in **Figure 2.2** below:

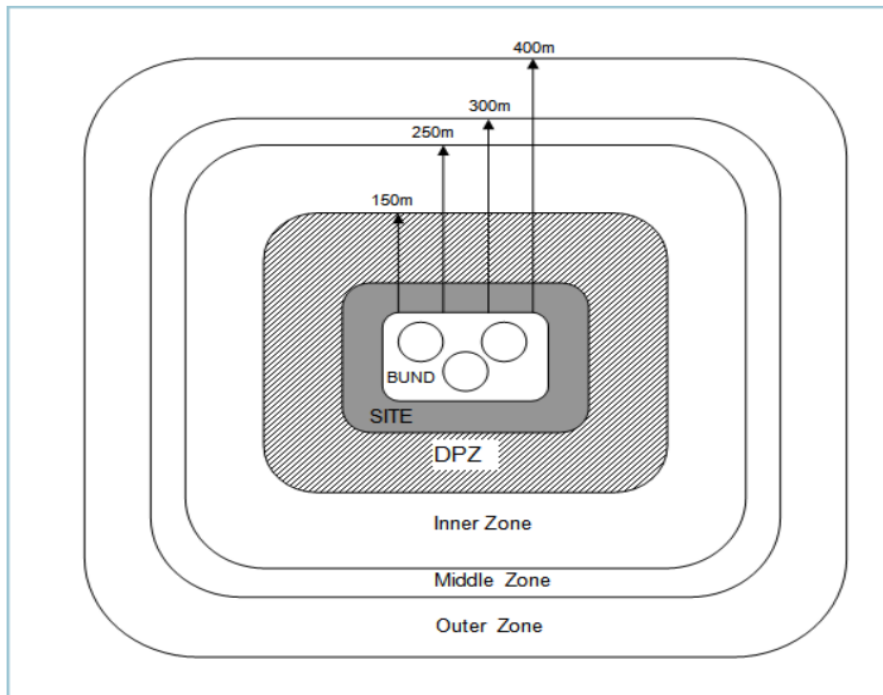


Figure 2.3: Development Proximity Zone

2.11 As the site is adjacent to the remaining functional elements of the Buncefield Oil Depot, the aforementioned decision matrix (**Figure 2.4**) applies to any decision made by HSE regarding any planning application within the above zones:

Sensitivity Level	Development in DPZ	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
0	DAA	DAA	DAA	DAA
1	AA	DAA	DAA	DAA
2	AA	AA	DAA	DAA
3	AA	AA	AA	DAA
4	AA	AA	AA	AA

Figure 2.4: HSE Decision Matrix - DAA = HSE does not advise against the development

2.12 For the avoidance of doubt, the site falls partially within the DPZ, Inner and Middle Zones. The existing car parking provision along the northern and eastern site boundary fall within the DPZ (and Inner Zone), as shown in **Figure 2.5** below.

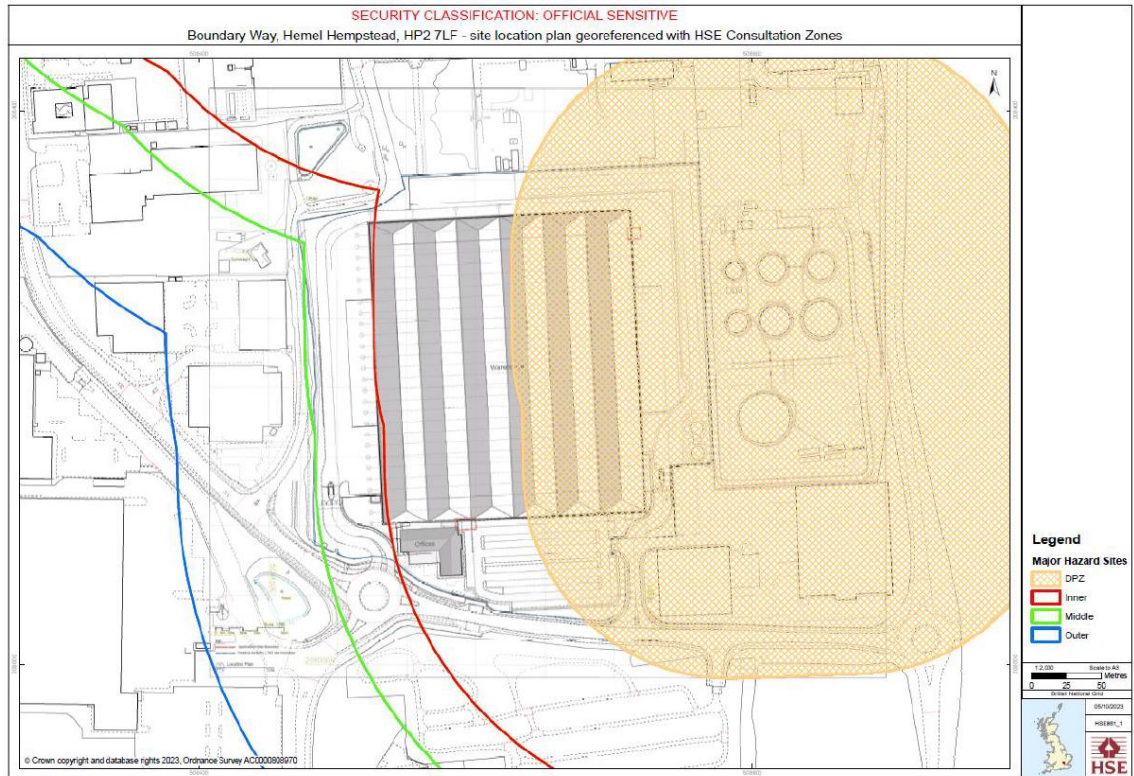


Figure 2.5: HSE Consultation Zones

Planning History

2.13 A full planning history of the site can be seen below, providing an overview of all applications submitted for the target site.

Table 2.1: Planning History Overview

LPA ref.	Proposal	Decision / Date	Commentary
24/00395/LDP	Alterations and extensions to existing warehouse.	Granted / 28 February 2024	
24/00396/LDP	Re-roofing, re-cladding and other minor alterations to existing warehouse	Granted / 28 February 2024	
21/04595/FUL	The creation of new roof access staircase to allow essential maintenance.	Granted / 21 January 2022	
21/01573/FUL	Installation of a new roof maintenance access stairs and CAT ladder	Granted / 4 June 2021	
4/00368/19/FUL	Installation of roof mounted solar pv panels and battery	Granted /	Understood this has not been implemented.

	storage system, including associated ancillary Infrastructure	7 June 2019	
4/01984/18/FUL	Installation of roof mounted solar panels and battery storage system including associated ancillary Infrastructure	n/a	No details available on Council's online planning register.
4/01533/16/FUL	Installation of evaporative cooler plant and roof extract cowls	Granted / 4 August 2016	
4/00800/16/CON	Application for a premises licence	n/a	No details available on Council's online planning register.
4/03465/15/FUL	Construction of temporary marquee extension to existing distribution centre canteen for a period of two years	n/a	No details available on Council's online planning register.
4/03420/15/FUL	Formation of overspill extension to existing staff car park with adjustments to fence and gate details	Granted / 29 December 2015	Relates to Parking Zone 2B
4/02113/15/FUL	Installation of evaporative cooler plant, condenser units and roof extract cowls	Granted / 17 July 2015	
4/03490/14/LDE	Construction of Canteen	Granted / 25 March 2015	
4/01434/13/FUL	Installation of an evaporative cooler plant and roof extract cowls	Granted / 18 October 2013	
4/01581/12/FUL	Amendment to car/hgv parking in the service yard and addition of turnstiles and bicycle shelter in the entrance area to the office building	Granted / 5 October 2012	Relates to Parking Zone 2A and Servicing Yard
4/01189/12/LDP	Widen link corridor by 1m.	Granted / 15 August 2012	Development under PD Rights
4/01942/11/FUL	Installation of sprinkler tanks and pump house	Granted / 6 January 2012	
4/02087/09/LDP	Maintenance and repair work	Granted / 25 January 2010	Certificate of Lawful Development for Repair Works to reinstate the

			development approved under the Original Planning Permission (below).
4/01709/06/FUL	Rebuilding of warehouse building with ancillary offices making good of service, parking and landscape areas	Refused / August 2007	
4/00664/03/FUL	Construction of new warehouse with ancillary offices and associated service areas and car parking	Granted / 22 June 2005	Understood to be 'the Original Planning Permission' . Note: A similar permission was also granted under LPA ref. 4/01113/02/FUL in April 2004.

- 2.14 Planning permission for the construction of the existing warehouse was originally granted in June 2005 (LPA ref. 4/00664/03/FUL). The site was subsequently damaged in the 2005 Buncefield Oil Storage Terminal explosion and repaired as set out in LPA ref. 4/02087/09/LDP (January 2010). Between 2012 and 2023, the site was occupied by Amazon as a warehouse/distribution centre and subject to several minor planning applications, as summarised above. Of note, changes to the site layout to accommodate revised car parking provisions were approved in 2012 (LPA ref. 4/01581/12/FUL) and 2015 (4/03420/15/FUL), respectively.
- 2.15 Regarding parking arrangements, the previous occupier sought in the first instance to increase the existing parking provision from 372 to 485 spaces, with the new uplift in parking spaces provided around the northern and eastern extents of the site, with the proposals consented in October 2012 (Parking Zone 2A).
- 2.16 Further alterations to the car parking arrangements were consented in December 2015 to form a 70 space overfill (to total 555 spaces) for when the car park is operating at full capacity during peak periods. Previously, this space had been used for HGV parking, however, was deemed surplus to requirements and thus extra car parking could be allocated.

3. Proposed Development

3.1 The following section summarises the Proposed Development. As set out in Section 1, this application seeks full planning permission for the consolidation of all existing car parking in a single location through the construction of a new MSCP (as well as minor external works to the existing ancillary office building).

3.2 The description of development for the Proposed Development subject of this planning application is:

“Full Planning Application for the construction of a new multi-storey car park (and linked consolidation of the existing car parking provision across the site), and any associated access, infrastructure and hard and soft landscaping works (as well as minor external alterations to the ancillary office building).”

Construction of new MSCP

3.3 To ensure an optimum use of this strategic employment site, it is proposed to consolidate all car parking within the existing main car park to the south of the warehouse. The reason for the proposed consolidation is threefold:

- It minimises walking distances for employees to the adjacent offices and warehouse;
- It creates additional operational yard space, as originally intended when planning permission was first granted, and improves vehicular flow and reduces *dwell time*/congestion at the site/car park entrance/exit, improves operational aspects of the site, and the circulation of vehicles; and
- Moves existing parking away from the boundary with the Buncefield Oil Depot Terminal (i.e. Parking Zone 2A which is wholly within the Development Proximity Zone [“DPZ”]), thereby improving the safety and security of on-site employees (and, in turn, reducing risks which is seen as a betterment to the existing layout/status quo).

3.4 To continue to provide sufficient on-site car parking for employees and visitors, it is necessary to accommodate those parking requirements in a newly constructed MSCP (which is proposed wholly within the Inner Zone rather than the DPZ).

3.5 As such, the proposals seek to provide a new total of 455 parking bays within the new MSCP and adjacent at-grade level parking, of which 5 per cent (23 spaces) will be allocated as accessible. The proposals otherwise seek to replace the existing provision (in form/nature) on a like-for-like basis. Electric vehicle charging provision may be provided by the Applicant under Schedule 2, Part 2, Class E of *The Town and Country Planning (General Permitted Development) (England) Order 2015*.

3.6 Overall, the car parking quantum will therefore reduce across the wider site as a whole (minus c.100 spaces), as the proposals seek to remove existing car parking spaces in the north-eastern parts of the site (Parking Zones 2A/2B). Whilst those areas sit outside the

application boundary, but within the Applicant's control, **it is proposed that the Council secures their removal and reinstatement as servicing yard by way of a Grampian Planning Condition** (i.e. prior to the first occupation of the new MSCP)¹, in line with the intentions of the original permission, bringing an additional benefit in that vehicular flow and circulation throughout the site will be improved.

Design

- 3.7 The design of the MSCP will comprise a light touch approach that responds accordingly to the host building and the surrounding context.
- 3.8 The design aims to emphasise the importance of establishing a visible and clear point of entry to the office space located on the site, and seeks to enhance the user experience by providing easy access to these spaces.

Location, Scale and Massing

- 3.9 The proposals strategically place car parking to the front of the site and away from the DPZ. In order to largely maintain a critical/required quantum of car parking provision on site, the proposals seek a MSCP comprising ground and three upper storeys.
- 3.10 To minimise the impact of adding any unnecessary bulk to the building, the proposed structure has been broken into several component parts, with the added benefit of creating a public face onto Boundary Way to appear less imposing on those traversing into and beyond the site.
- 3.11 To do this, the concept splits the mass of the building into two component halves, more in keeping with the mass and scale of the existing office park. The eastern parts of the car park located within the DPZ remain at-grade level.

Materiality

- 3.12 The design of the MSCP will comprise a light touch approach that responds accordingly to the host building and the surrounding context. The proposed materiality can be seen in **Figure 3.1** below, comprising of perforated metal cladding and single tone ceramic fins, which provide a modern finish to the exterior of the car park.

¹ As the LPA will be aware, planning conditions can be applied to land outside the application boundary, but within the control of the Applicant, subject to ensuring that the Applicant has sufficient control over the respective land so that any such works can be carried out (i.e. see Paragraph 37, Circular 11/95: Use of conditions in planning permission). This is the case here with the Applicant being the freeholder of the wider site.



Figure 3.1: CGI of the Proposed Development (Design and Access Statement, prepared by GTH)

- 3.13 The material palette has been chosen to provide a sympathetic, human scaled appearance onto Boundary Way, with light, multi coloured cladding to contrast the existing and proposed metal cladding seen elsewhere on the site. The two “towers” at each side of the site will be clad in flat metal, again offering a contrast to the other elements on site to create an identifiable ‘wayfinding’ feature of the car park.
- 3.14 A full set of planning drawings, and accompanying Design and Access Statement have been provided in support of this application, which show the location of parking spaces, the location of access ramps, and the pedestrian lifts.

Accessibility

- 3.15 Of the 455 parking spaces proposed within the development, 5 per cent of the total (23 spaces) will be allocated as accessible.
- 3.16 To maximise accessibility from the car park to the office space, the entrances to the office will have level access (unchanged from the existing extent), with no gradient changes across the site.
- 3.17 By virtue of the proposed location of the car park, a best possible solution has been provided that also minimises walking distances for incoming employees to the indoor office spaces and the warehouse entrance, maximising the accessibility of the site for those that may otherwise struggle given the total size of the warehouse building.

Landscaping and Biodiversity

- 3.18 Whilst some existing vegetation is subject to removal in order to facilitate the new MSCP, the proposals seek to reinstate minor areas of hard and soft landscaping within the application boundary as shown on the submitted plans/drawings. Full details are proposed to be conditioned.

- 3.19 To comply with the Environment Act (2021) which requires developments in England to demonstrate a measurable net gain in biodiversity (“BNG”) and sets a target of a minimum of 10 per cent BNG for all developments, it is proposed to provide the necessary units within the application and wider site under the control of the Applicant (i.e. area within the red and blue lines). Details of the required units and provision are set out in the supporting Biodiversity Net Gain Assessment. As with the cease of the existing car parking areas, it is proposed that **a Grampian condition is applied to deliver the required 10 per cent BNG within the land under the Applicant’s control alongside a management plan with a minimum 30-year term.**

External Alterations to Existing Ancillary Office Building

- 3.20 As noted above, minor external works are proposed to the existing ancillary office building in order to improve its future maintenance. The scope is fairly limited and relates to:
- Removal of brise soleil: This is aimed at improving the building's maintenance accessibility.
 - Like-for-like roof replacement: The existing roof has reached the end of its lifespan and requires replacement.

4. Pre-Application Engagement

- 4.1 As set out in Section 1, this planning application has been subject to informal pre-application discussions with the HSE, and Dacorum BC.

Consultation with HSE (October 2023)

- 4.2 The Applicant met with the HSE at an in-person meeting in Buxton on 10 October 2023 (ref. D2061). During this meeting, the HSE confirmed their role as statutory consultee.
- 4.3 Two design options for a MSCP to the south of the warehouse were discussed including a single deck option covering the entire existing car park in this location (partially within the DPZ and Inner Zone), and a MSCP solely within the Inner Zone, i.e. maintaining at-grade level parking for the remainder of the car park area within the DPZ.
- 4.4 HSE confirmed that it would advise against (“AA”) a single-deck option partially within the DPZ, as such an option might increase confinement if a flammable vapour cloud were to enter at ground/low level and could intensify any explosion and lead to higher over pressures impacting on nearby buildings (in accordance with circular SPC/Tech/Gen/43).
- 4.5 Notwithstanding, HSE confirmed that it would **not advise against development** (“DAA”) if a MSCP solely within the Inner Zone was proposed. Advice received from HSE has thus informed the proposed development subject to this planning application.
- 4.6 In line with the HSE’s four sensitivity levels (SL1, SL2, SL3, SL4; SL0 developments are those that are not normally occupied) and decision matrix, the proposed MSCP has been located within the Inner Zone, rather than the DPZ, thereby attracting a **SL1** rating (and HSE would consequently not advise against development, DAA).

Site Visit and Informal Discussions with Dacorum BC (March 2024)

- 4.7 A site visit had taken place on the 1st March 2024 that involved representatives from Dacorum Borough Council, Turley, Murphy, and Sysco, to illustrate the primary objectives and aspirations for the proposed future operation of this site.
- 4.8 At the meeting, it was understood that Dacorum BC indicated wider support for the investment into the site and its strategic employment function, thereby making sure that it is brought back into operation.
- 4.9 The Applicant is further in discussions with the LPA about wider pre- or post-submission discussions to refine the proposals where necessary.

5. Planning Policy Context

Development Plan and National Planning Policies

- 5.1 Planning legislation requires that proposals should be determined in accordance with the development plan unless material considerations indicate otherwise. Consideration of compliance with the development plan is required for all applications, and it is the responsibility of the decision maker as to how weight is applied, or to any other material considerations.
- 5.2 The Development Plan for Dacorum BC determines that the following documents would be referred to in the consideration of any development proposal within the Borough:
- Dacorum Borough Core Strategy 2006-2031 (adopted September 2013);
 - Dacorum Borough Local Plan 1999-2011 Saved Policies (adopted April 2004);
 - Site Allocations Development Plan Document (DPD) (adopted July 2017)
- 5.3 National planning policy is contained within the National Planning Policy Framework (“NPPF”, 2023). This is a material consideration of significant weight, alongside the National Planning Policy Guidance that supports it (updated 2023), which also includes the National Design Guide (2019).
- 5.4 With regard to the National Planning Policy Guidance, further attention should be brought to the ‘Hazardous Substances’ section, which notes how the Planning System deals with preventing and limiting the consequences of major accidents:
- “When considering development proposals around hazardous installations the local planning authority is expected to seek technical advice on the risks presented by major accident hazards affecting people in the surrounding area and the environment. This advice is sought from the Control of Major Accident Hazards (COMAH) competent authority. This allows those making planning decisions to give due weight to those risks, when balanced against other relevant planning considerations.”*
- 5.5 Other national and local policy and guidance relevant to this application includes the following:
- Planning (Hazardous Substances) Act 1990
 - Planning (Hazardous Substances Regulations) 2015
 - HSE: Land Use Planning Methodology
 - Car Parking Standards SPD (2020)
 - Planning Obligations SPD (2011)
 - Roads in Hertfordshire, Highway Design Guide 3rd Edition (2011)

- Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (2011)

Emerging New Dacorum Local Plan

- 5.6 Dacorum BC is currently in the early phases of updating their current Development Plan documents, with consultation most recently taking place between October and December 2023.
- 5.7 The Council are currently collating feedback from the responses received, ahead of the next formal stage of consultation set to take place in late 2024.
- 5.8 On this basis only limited weight should be afforded to any policies given the current draft and pre-submission status of the Local Plan in accordance with NPPF Paragraph 48.

Site Designations

- 5.9 Relevant development policies applicable to the proposals are referred to as appropriate within the planning assessment section below. The site falls under the following local plan spatial policy designations, as seen in the Adopted Policies Map below (**Figure 5.1**):

- General Employment Area (Maylands Employment Area, Hemel Hempstead)
- Health & Safety Executive ('HSE') Consultation Zone (Hazardous Substance Buffer) [Note: Site within Development Proximity Zone ('DPZ'), Inner Zone and Middle Zone1]
- Parking Standards: New Zone 3
- EA Source Protection Zone: 3
- RAF Halton and Chenies Zone: Green
- CIL Zone: 3
- Flood Risk Zone 1

- 5.10 The site is also in close proximity to:

- Open Land

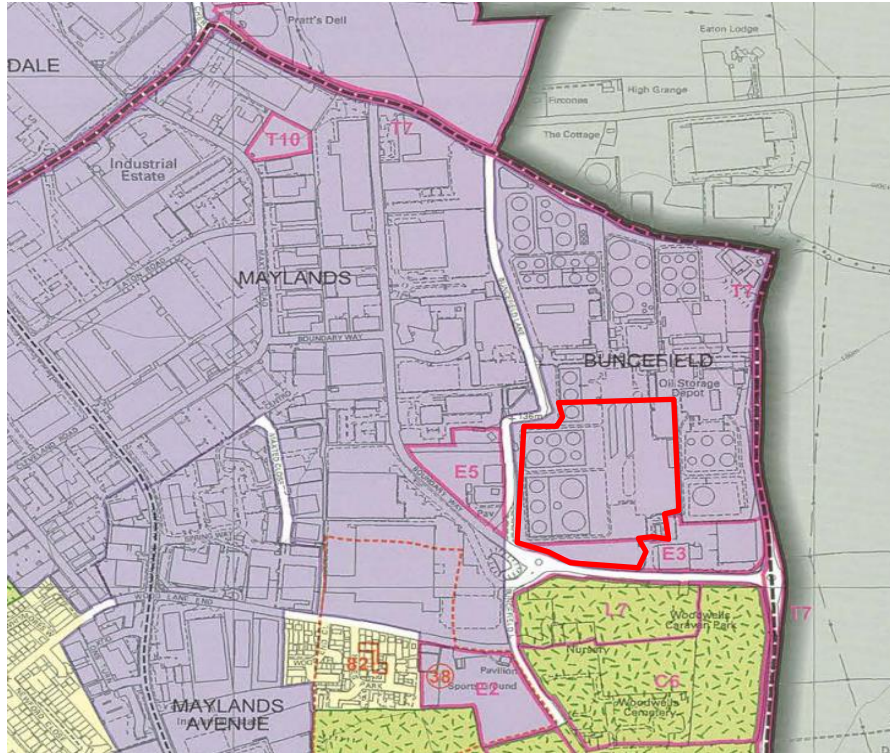


Figure 5.1: Extract from Dacorum BC Policies Map, showing site designations (Approx. site boundary added by Turley)

- 5.11 Substantive material considerations also have to be taken into account by the Council as a decision maker. They act as material considerations in their own right, and include planning benefits that would arise from the proposed development. This may include social, economic or environmental benefits.

6. Planning Assessment

- 6.1 This section assesses the Proposed Development against key planning policy considerations at national, regional and local level as well as other relevant material considerations.

Principle of Development

Principle of sustainable development

- 6.2 While the development plan forms the statutory basis for the determination of a planning application, the Council must also apply the 'presumption in favour of sustainable development' which is at the heart of the NPPF, as part of the assessment of the planning balance of whether a proposed development complies with the development plan as a whole. To sum up, a proposed development benefits from what is known as a "tilted balance" in favour of it being granted permission.
- 6.3 NPPF Paragraph 11 states that decisions should apply the presumption in favour of sustainable development and for decision taking this means approving development proposals that accord with the development plan without delay.
- 6.4 This will be returned to in Chapter 7 of this Statement, which is the Applicant's assessment of the planning balance and conclusion. However, it is the conclusion of this Planning Statement that the proposed development complies with the development plan and represents sustainable development.

Principle of Car Parking Facilities

- 6.5 Policy CS1 of the Dacorum Core Strategy states that decisions on the scale and location of the development will be made in accordance with the settlement hierarchy, which in relation to employment land, seeks to maintain a balanced distribution of growth within the Mayfield Business Park. Policy CS13 (Economic Development) adds that Hemel Hempstead will be the main focus for new economic development uses, which will be used to support the regeneration of the Maylands Business Park.
- 6.6 Dacorum Local Plan Policy 31 (General Employment Areas) clarifies that development and redevelopment will be permitted in General Employment Areas where it concerns employment generating uses as identified per region within the Local Plan. For the subject site, permitted uses include "Business, Industry, Storage and Distribution".
- 6.7 Core Strategy Policy 34 (Maylands Business Park) confirms that new development in Maylands Business Park should contribute fully to the achievement of use, movement and design principles, including to deliver services and facilities to support small and large businesses in appropriate character zones.
- 6.8 Principally, the provision of the car park to provide consolidated facilities in an appropriate location that grants access to both the warehouse and the office facilities is acceptable in principle given that it directly responds to key strategic objectives of Policies CS1, CS13 & CS14 of the Dacorum Core Strategy that seeks to ensure that sites within the Council's designated employment areas (continue to) provide a range of socio-economic benefits and maintain a balanced distribution of employment growth.

- 6.9 The proposed development will facilitate a significant capital investment (in excess of £100m) into the Borough with direct, positive effects for the local economy, not least the continued provision of employment opportunities and an active use on the site (as well as the temporary employment generated by the construction works). This is particularly relevant as Maylands Business Park is not only identified as a General Employment Area, but also as the Council's main focus for economic-related development and activity.
- 6.10 To bring this significant warehouse facility back in an active employment use and ensure an optimum use of this strategic employment site, it is therefore necessary to consolidate all car parking within the existing main car park to the south of the warehouse, particularly as this also:
- Minimises walking distances for employees to the adjacent offices and warehouse;
 - Creates additional operational yard space, as originally intended when planning permission was first granted, and improves vehicular flow and reduces dwell time/congestion at the site/car park entrance/exit, improves operational aspects of the site, and the circulation of vehicles;
 - Reduces the consented amount of car parking by approx. 20 per cent (555 to 455);
 - Moves existing parking away from the boundary with the Buncefield Oil Depot Terminal, thereby improving the safety and security of on-site employees (and, in turn, reducing risks which is seen as a betterment to the existing layout/status quo); and
 - Otherwise improving the safety of employees by removing the conflict between pedestrians and HGVs around the site.
- 6.11 As such, it is considered that the principle of development which secures the long-term future operation of a strategic employment site in the Maylands Business Park is – in planning policy terms – aligned with key Development Plan objectives.

Design

- 6.12 Dacorum Local Plan Policy CS12 (Site Design) seeks that on each site development should:
- Provide a safe and satisfactory means of access for all users;
 - Provide sufficient parking and sufficient space for servicing;
 - Avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to the surrounding properties;
 - Retain important trees or replace them with suitable species if their loss is justified;

- Plant trees and shrubs to help assimilate development and softly screen settlement edges;
- Integrate with the streetscape character; and
- Respect adjoining properties in terms of:
 - Layout;
 - Security;
 - Site coverage;
 - Scale;
 - Height;
 - Bulk;
 - Materials; and
 - Landscaping and amenity space.

6.13 Core Strategy Policy CS34 (Maylands Business Park), further seeks to emphasise the importance of movement gateways through appropriate features and bolder building design and height.

6.14 The design of the new car park, through its high quality architecture, choice of materials, and built form will ultimately deliver safer and improved parking provision for employees and visitors in a well-designed MSCP.

6.15 At the core of the proposal’s design approach is the aim to deliver a high quality MSCP, taking into account the site’s location and the surrounding context. The design has focused on providing sensible enhancements that would be seen from outside of the site, in a location that is confluent with the existing office building and warehouse entrances. Further detail with respect to each component of the proposal is provided in the supporting subsections and Design and Access Statement prepared by GTH.

Location and Layout

6.16 As mentioned, the car parking quantum will reduce across the site as a whole. The proposals are subject to existing car parking spaces in the north-eastern parts of the site to cease and be reinstated as operational yard/parking space, in favour of relocating and consolidating car parking within a single location. As noted in Section 3 above, **a suitably worded Grampian condition should be applied to a future planning permission seeking the cessation and removal of the existing car parking spaces in those locations and for the area to be reinstated as yard space.**

6.17 As such, the proposals will free up space around the outer edges of the site, which will enhance the ability for service vehicles and lorries (crucial for the needs of the new occupant) to both access, egress, operate, manoeuvre and park within the wider site

safely, further removing any pedestrian conflict with parked vehicles, and therefore assist the general circulation of vehicles around the wider site.

- 6.18 The proposal will also relocate a large proportion of the car parking and activity to areas outside the DPZ.
- 6.19 The position of the car park thus provides benefits on multiple fronts, making improvements to the layout, and total site coverage of parking across the site, with a simple yet effective design that allows users to access the car park from the front of the site without interfering with other servicing buildings operating within and around the warehouse. As such, it is considered that the proposals accord with Local Plan Policy CS12 and CS34.

Scale and massing

- 6.20 The existing wider development context is dominated by the existing warehouse building and its ancillary office building facing onto the Boundary Way roundabout.
- 6.21 In locating the car park at the front of the site, the Architect has been cognisant of the possibility that the car park would dominate the Boundary Way facing edge of the site. Therefore, the massing of the building has been broken down into several components in order to keep a consistency between the car park itself and the existing office element, although they will be differentiated by differing façade treatments and forms.
- 6.22 The proposed MSCP has the added benefit of creating a public face onto Boundary wall, of a reduced scale to that of the warehouse. The mass of the building has been split into two component halves, more in keeping with the mass and scale of the existing office park, each defined by different facade treatment and forms.
- 6.23 Given the context of the site, and the lack of neighbouring occupiers, the scale/mass of the car park has been assessed against any impacts against the wider development itself (and the surrounding designated employment area). The approach to effectively break down the development into several components minimises the visual impact of the car park itself, instead appearing as a continuation of the warehouse and office space, is considered to successfully integrate the new form of development within its surrounding context. Thus, it is considered that there are no additional concerns relating to mass and scaling within the proposed development, in accordance with the wider design considerations within Core Strategy Policies CS12 and CS34.

Appearance and materiality

- 6.24 The design of the car park has been articulated in a way as to not dominate the existing office building, and to provide a confluent approach with the warehouse. The car park will use high quality materials to create a visually engaging building which provides an inviting, clear end of journey for those working at the site.
- 6.25 The materiality of the MSCP will comprise a light touch approach that responds accordingly to the host building and the surrounding context, comprising of perforated metal cladding and ceramic fins, which provide a modern finish to the exterior of the car park. As seen in **Figure 6.1** below, the materials provide a more visually interesting façade through the introduction of multi-coloured fins that contrast with the metal cladding used elsewhere on the car park, although leaving the opportunity to utilise a

more muted colour palette that would lend translucency while contrasting with the metal cladding.

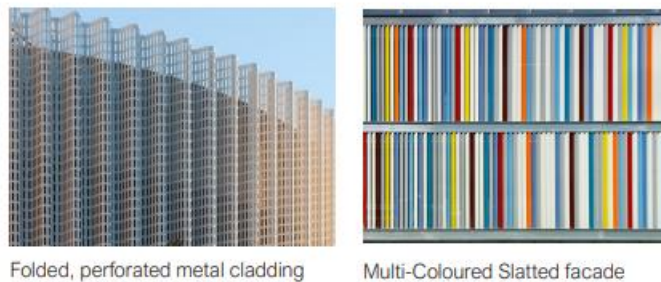


Figure 6.1: Proposed Material Palette (Design and Access Statement, prepared by GTH)

- 6.26 Thus, the proposals show a variety of materials and visual intrusion, by providing a transparent approach which will let plenty of sunlight into the car park, and the materials themselves are of a high quality, and refresh the monotonal colour palette currently on site.
- 6.27 Overall, the proposals are considered to achieve an improvement on the appearance of this important gateway site, constituting an entrance befitting an international business through a considered, high quality approach in accordance with Core Strategy Policy CS12 and CS34.
- 6.28 Likewise the minor works to the existing ancillary office building seek to improve its future maintenance and relate solely to the removal of the brise soleil and a like-for-like roof replacement which has reached the end of its lifespan.

Accessibility

- 6.29 The design of the car park has also carefully considered accessibility requirements of potential users, ensuring that the car park can be used effectively by all end users.
- 6.30 The entrances to the office remains level, and gradients to the site have remained unchanged to not make access and egress to the site any more strenuous than the existing arrangement.
- 6.31 The materials palettes has also considered entrance surface types to reduce the risk of slipping when entering and leaving the car park, as well as ensuring that floor surfaces have low levels of reflectance. The proposals thus show an inclusive approach to design, in accordance with Core Strategy CS12 which seeks to provide a safe and satisfactory means of access for all users. For the avoidance of doubt, all accessible car parking spaces are provided at ground floor level.

Summary

- 6.32 The setting and orientation of the MSCP towards Boundary Way ultimately provides an active, engaging frontage to the building that provide an improvement on the appearance of this important gateway site, constituting an entrance befitting an international business through a considered, high quality approach. The scale and

massing of the car park is in keeping with the warehouse and office currently on site, and would not visually intrude upon any other elements within the surrounding area.

- 6.33 The proposed design features enhance the overall design quality of the building, whilst ensuring sustainable, effective materials are used to minimise waste where possible. Overall, the MSCP represents good design and accords with the general principles of urban design identified in the adopted Development Plan.

Landscaping

- 6.34 Core Strategy Policy CS12 (Quality of Site Design) notes that new development proposals should respect adjoining properties in terms of landscaping and amenity space.
- 6.35 Core Strategy Policy 34 (Maylands Business Park) adds that where appropriate, landscaping features should be added to emphasise the importance of movement gateways. New landscaped features are provided at ground level within the application boundary to improve the approach to the site and add a sense of place. Full details should be conditioned and be provided at the time of first occupation and/or the next planting season.
- 6.36 In consideration of the wider biodiversity requirements of the site, a light touch approach has been taken to soft landscaping within the application blue line. Soft landscaping measures are therefore proposed south of the existing office at the southern extent of the ownership boundary, and at the north eastern extent parallel to Buncefield Avenue.

Biodiversity

- 6.37 It is noted that due to the provisions of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Biodiversity Net Gain (BNG) will become a mandatory requirement on all proposals by 2 April 2024.
- 6.38 Given that the majority of the site comprises built form or existing hardstanding the preexisting Biodiversity Value had been set at 0.29 as assessed by the Applicant's ecologist.
- 6.39 The submitted Biodiversity Report, prepared by Arbtech, confirms that the Applicant has agreed to provide additional biodiversity enhancements across the application site and wider land within its control (i.e. within the blue line). The submitted site plan illustrates a number of areas to provide the required biodiversity units in order to achieve a BNG of at least 10 per cent.
- 6.40 It is proposed that the provision of the respective units (10.18% net gain of linear units and 12.44% area habitat units) is subject to a Grampian condition alongside a management plan with a minimum 30-year term.

Transport, Deliveries and Servicing

- 6.41 Core Strategy CS8 (Sustainable Transport) ensures that all new development will contribute to a well-connected and accessible transport system whose principles are to

give priority to other road users (i.e, those not using the private car), ensures good access for people with disabilities, and improves road safety.

- 6.42 The proposals ultimately seek a reduction in the total number of car parking spaces on site (by c.20 per cent), thereby providing what is deemed necessary for the future operation of the site whilst also encouraging the use of other forms of public transport (see new Travel Plan prepared by TPP). The proposals have carefully considered the location of the car park to reduce potential stresses on the road network, and minimises further impacts to the servicing arrangements for the warehouse that requires turning points for HGVs. Further assessment with respect to each component of the proposals are provided below.

Car Parking

- 6.43 Dacorum Local Plan Policy 57 (Provision and Management of Parking) states that parking provision will be used as a tool to encourage reduced car ownership and usage, in order to improve the condition of the environment, limit issues from additional traffic, and reduce pollution where possible. With respect to the total levels of provision requested, the Council request that the minimum level of car parking provision will be sought by adopting maximum demand-based standards of provision.
- 6.44 With regard to non-residential parking, operational and customer parking will be kept to a minimum, with the precise level of provision justified in each case. Employee parking needs should as far as possible not be met on site, and instead should be dealt with through a Green Travel Plan by alternative provision for non-motorised or passenger transport, or off site public parking.
- 6.45 Core Strategy Policy CS8 adds that where appropriate, development provides sufficient, safe and convenient parking based on the currently adopted car parking standards, in consideration of the accessibility of the location and promoting economic development and regeneration.
- 6.46 The Parking Standards Supplementary Planning Document (2020) states that in relation to non-residential storage and logistics uses, parking should be provided in accordance with the following standards:

Table 6.1: Car parking requirements (Dacorum Parking Standards SPD)

Use Class	Accessibility Zone	Car Parking Requirements	Accessible Parking
B8 (Storage and Logistics)	3	1 space per 75 sqm (GEA) Parking provision for lorries to be considered on a case by case basis.	1 space for each employee who is a disabled motorist, plus 5% of the total capacity for visiting disabled motorists. It is desirable that a further 5% of the total capacity should be enlarged standard spaces.

- 6.47 With regard to the dimensions of spaces, a standard of 2.4m x 4.8m should be met to allow for sufficient separation distances between parked vehicles (which is achieved and also replicates existing parking spaces to be removed).
- 6.48 The SPD also states that non-residential parking is appropriate for the location and type of land use, and that parking is managed, both on site and off site to avoid parking problems with other uses within the site.
- 6.49 To confirm, the proposed development only seeks alterations to the car parking, and does not provide any additional floorspace within the main warehouse.
- 6.50 It also should be noted that the prescribed standards are to be addressed as a maximum quantum, rather than as target to be achieved. The reduction of parking spaces in this instance (while maintaining an acceptable level of accessible parking and according with the spatial standards) therefore also show an intent to minimise private car use to the site as appropriate, in consideration of the location of the site.
- 6.51 With regard to EV charging spaces, bays will be replaced like for like in line with the existing arrangement, which suitably meets the needs of employees on site, and providing sustainable alternatives to standard petrol cars. However, as noted above, new electric vehicle charging facilities may be provided under the respective permitted development rights separate to this planning application.
- 6.52 Therefore the consolidation of parking within a single location, in accordance with the quantum and designed to the specification noted above are therefore considered in accordance with the Parking Standards SPD and the wider objectives of the Dacorum Local Plan.

Highways Impact and Trip Generation

- 6.53 Dacorum Site Allocations Policy SA3 (Improving Transport Infrastructure) confirms that development will support and not prejudice the delivery of new and improve transport infrastructure for both the main transport proposals and other schemes.
- 6.54 The supporting TA confirms that the proposed MSCP will consolidate existing spaces and reduce the number of car park spaces that are already available on site. As such, a majority of the trips generated by the site are likely to already exist on the surrounding highway network and are not 'new' trips. Furthermore, the reduction in spaces and consolidation of facilities means that there will no longer be a conflict between cars entering and exiting two separate car parking areas.
- 6.55 The TA has also considered the proposed updates to the highway via Boundary Way and Buncefield Lane, to which the proposals are concluded to not have an impact on.
- 6.56 It is therefore concluded within the TA that there will be no significant impacts from the proposed enabling works application on the highway network.

Deliveries and Servicing

- 6.57 The Dacorum Parking Standards SPD notes with regard to servicing and lorries that there be adequate provision and space within the site for the parking, manoeuvring, loading and unloading to meet the operational servicing requirements of the development. The

space set aside for servicing should be of suitable size for the type and quantity of vehicles likely to be associated with the development. Delivery vehicles should be able to safely enter and exit the site in a forward gear.

- 6.58 Through the erection of a MSCP at the front of the site, the proposals will allow for space to be freed up elsewhere on the site as per the arrangement prior to the most recent occupier.
- 6.59 Wider access, servicing and delivery matters were already considered when the original planning permission was granted and are therefore not subject to this planning application.

Summary

- 6.60 As such, the TA concludes that the proposed development accords with Core Strategy Policy CS8, Local Plan Policy 57, and the requirements within the Dacorum Parking Standards SPD. There are therefore no reasons from a traffic and transportation perspective why the proposed enabling works should not be granted planning permission.

Other Considerations

Flood Risk and Surface Water Drainage

- 6.61 Broadly, the Site Allocations DPD (2017) indicates that flood risk should be carefully considered within all developments to ensure that both people and property are protected from flooding.
- 6.62 More specifically, Dacorum Core Strategy CS31 (Water Management) confirms that all proposals irrespective of flood zone should where possible minimise water runoff, and secure opportunities to reduce the cause and impact of flooding.
- 6.63 The site is located within Flood Zone 1, and has a low probability of flooding. A high-level Flood Risk Assessment has been submitted as part of this application which concludes that the proposed multistorey car park accesses and access paths leading to it will be set above the existing levels where there is a possibility of surface water flooding.
- 6.64 Whilst the site is subject to a fully operational drainage strategy, the application site has been reviewed from a drainage perspective in light of the construction of the MSCP and updated proposals are enclosed setting out improvements to the existing provision. The proposals will limit the surface water discharge rate to 2.0l/s for all storms up to and including 1 in 100years storms plus climate change, and therefore providing a significant reduction in the discharge rate. Proposed SuDS will include SuDS Pipes (perforated pipes surrounded in granular material) and below ground attenuation tanks. Thus, the proposals are deemed to be in accordance with the aspirations of the Site Allocations DPD Core Strategy Policy CS31.
- 6.65 Drainage proposals within the wider site are not subject to this application.

Air Quality

- 6.66 Dacorum Local Plan Policy 51 (Development and Transport Impacts) states that major development proposal should consider air pollution and air quality implications of

transport demands arising from the development, and should be specifically considered such applications.

- 6.67 Core Strategy CS8 (Sustainable Transport) adds that all new development should improve air quality where possible.
- 6.68 It should be noted that the subject site does not fall within an Air Quality Management Area, indicating that the existing air quality condition on site is already of an acceptable standard. No additional floorspace is proposed and the amount of car parking is reduced. In air quality terms, the site is therefore not considered to result in any significant adverse effects compared to its current lawful operation.

Fire

- 6.69 Details regarding fire safety have been provided within the Design and Access Statement prepared by GTH, informed by specialist input from Semper, with the credentials of the authors set out, and submitted in support of this application.
- 6.70 The additional details show how fire safety has been considered in line with best practice guidance, informing the final proposals. The design, structure and package of measures align and in some cases exceed the recommendations of the prescriptive guidance outlined under BS 9999:2017, demonstrating that the design of the car park is of itself a high standard of fire safety.

Contamination

- 6.71 For the avoidance of doubt, the site has been fully remediated when the original planning permission was implemented. Validation reports of the remediation strategy undertaken at the time can be provided to the Council upon request. For the avoidance of doubt, other than the foundations of the MSCP, no intrusive works are proposed.

Community Infrastructure Levy (CIL)

- 6.72 Dacorum BC approved their CIL Charging Schedule on 25 February 2015, with the Charging Schedule coming into effect on 01 July 2015. The Charging Schedule identifies developments where CIL is expected based on the proposed use, and the zone to which the development falls within.
- 6.73 The proposed development is for a new MSCP ancillary to an existing warehouse lawfully operating within Use Class B8. The CIL rate for (ancillary) Use Class B8 floorspace falls within the 'Other' category, thus the charge is classified as 'Nil'. As such, the proposed development is not deemed CIL liable.

7. Summary and Conclusions

- 7.1 Full planning permission is sought for the erection of a MSCP, in support of the operation of the existing warehouse located at Hemel465, Boundary Way, Hemel Hempstead, Herts, HP2 7LF.
- 7.2 This planning application is accompanied by a full set of plans and drawings, Design and Access Statement, and relevant technical assessments which demonstrate that the scheme is acceptable from an environmental, architectural, and economic perspective and in accordance with relevant objectives of the Development Plan.
- 7.3 The location of the MSCP is considered to be appropriate and reflects guidance received from the HSE.
- 7.4 The proposed works are part of the wider, large scale investment (in excess of £100m) into the refurbishment of the existing warehouse by the Applicant, and its new tenant, reaffirming their commitment to operating this strategic employment site for the next 25 years. As you will agree, ensuring that the quality of the environment and construction of the proposals will be crucial in securing the success of this significant economic venture for both the Applicant and the Borough that will provide excellent employment opportunities for its residents.
- 7.5 As noted under the Planning Assessment, the Council must also apply the 'presumption in favour of sustainable development' which is at the heart of the NPPF, as part of the assessment of the planning balance of whether a proposed development complies with the development plan as a whole. In the context of the Planning Assessment set out in Chapter 6, it is considered that the proposals comply with the development plan and also deliver a range of associated planning benefits.
- 7.6 The key benefits of the proposals are:
- Provision of high quality and consolidated car parking spaces to provide a more unified approach to parking at the front of the site, suiting the requirements of the incoming occupier;
 - Provision of a high quality design in terms of visual appearance, scale and massing that seeks to enhance the existing building, whilst providing contemporary additions that integrate with both the existing building in accordance with wider vision of Hemel Hempstead;
 - Effectively releasing space elsewhere on the site to allow for additional space for HGVs to manoeuvre the yard space in an approach which will be less cluttered than the existing; and
 - Enabling the re-use of c.43,200sqm of warehouse space within a designated employment area that will ultimately bring significant economic benefits to the Hemel Hempstead and Dacorum more broadly.

- 7.7 The balance of these key planning benefits, alongside the presumption in favour of sustainable development as set out in the NPPF therefore weighs heavily in favour of the granting of planning permission.
- 7.8 Overall, the proposals are considered to represent exemplary sustainable development in line with the objectives of the development plan. Therefore, we consider that planning permission should be granted.

Turley Office
Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 7851 4010